

**Evansville Marine
Service**

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April 9, 2003

Ref. Docket USCG-2001-8773

Dear Sir:

In regards to the proposal to require alcohol-testing devices onboard all commercial vessels I believe that such a rule would place undue burden on several aspects of the maritime industry with little or no benefit. I am the Compliance Director for a river harbor service which operates several vessels over approximately 100 miles of the Ohio River. All of our vessels operate out of a harbor with easy access to medical facilities equipped to conduct drug/alcohol screening. Additionally, our vessels operate with a two (2) man crew which would place a pilot in the position of testing his deckhand and the deckhand testing the pilot. Obviously this is not an acceptable method of testing. As our standard operating procedure we require post incident drug/alcohol testing in some situations where it is not required by regulation. Obviously no alcohol screening device is designed to be as efficient as an evidential test and the use of such a device when an evidential test is available may place increased liability on the marine employer should it show positive. We would continue to require testing at a medical facility regardless of this regulation.

While it is possible that the requirement for onboard testing equipment may need to be expanded, requiring it on all commercial vessels is inefficient and not cost effective. My 21 years as a civilian law enforcement officer and 21 years dealing with commercial vessels as a Coast Guard reservist tell me that the most efficient testing method is generally the best.

Sincerely,

Gary S. Jarboe
Compliance Director